



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

23 June 1998

Mr. Philip Otis, P.E., Remedial Project Manager
US Department of the Navy, Northern Division
Code 18, Mail Stop #82
10 Industrial Highway
Lester, PA 19113-2090

RE: Feasibility Study Report
IR Site 07 - Calf Pasture Point
NCBC Davisville, Rhode Island
Submitted 30 April 1998, Dated April 1998

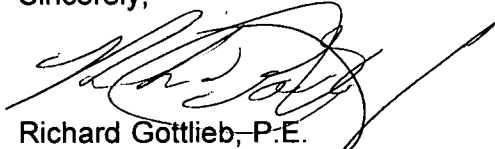
Dear Mr. Otis;

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the above referenced document. In general the document is acceptable, though RIDEM has the following concerns:

1. The Navy makes references throughout the document that there is no complete pathway to ecological receptors and therefore no potential risk. RIDEM disagrees with this statement since the potential exists for VOC to migrate from the site to sediments in Allen Harbor and Narragansett Bay. Though to date this has not been observed, the modeling and geologic information show the potential for deep groundwater to discharge along the shores of Calf Pasture Point. RIDEM has concerns that VOC in sediments can adversely affect shellfish which live in the sediments. Please revise these statements accordingly.
2. In Chapter 2, Page 35 please change "North Kingstown POTW" to "RIEDC POTW" as North Kingstown does not have a sewer system.
3. The Remedial Investigations and Risk Analyses must be included on the deed when the restriction prohibiting the use of groundwater is placed.
4. Section 5.1 states that it will be the responsibility of the Town of North Kingstown to enforce the groundwater use restriction at Calf Pasture Point. The issue of deed restriction enforcement has not been fully discussed and there is no correspondence from the Town to indicate that they will accept responsibility of enforcing deed restrictions.

RIDEM looks forward to working with the Navy and EPA on the completion of this document. If you have any questions or require additional information please call me at (401) 222-2797 ext. 7138.

Sincerely,



Richard Gottlieb, P.E.
Principal Sanitary Engineer

Attachment:

cc: W. Angell, DEM OWM
C. Williams, EPA Region 1
H. Cohen, RIEDC

S. Licardi, ToNK
W. Davis, CSO NCBC
J. Shultz, EA Eng.

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